

BREMACH, Inc.



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Jean, Nevada 89 019

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November 18, 2021

TO:
David C. Hurlin
EPA Imports Line, Exemptions
Imports@epa.gov

RE: Request for Temporary Importation - TESTING

Request is being made by:
Miro Kefurt, CEO
Bremach, Inc.
PO Box 19294
Jean, NV 89019

Reason for import of the two test vehicles:

Bremach, Inc. has been collaborating with UAZ LLC (Russian OEM of UAZ Brand vehicles) in order to develop version of UAZ Patriot 4x4 SUV for sale in USA under the BREMACH Brand since 2018.

The initial development work has been done in Russia by several companies in addition to UAZ LLC (Sollers and NAMI).

Two UAZ Patriot 4x4 SUV with Automatic Transmission were imported for final evaluation and emission testing using California Reformulated gasoline with 10% Ethanol content and octane rating of 87. This was necessary as such fuel is not available in Russia. Also there are no Emission Test Laboratories that are certified by EPA or CARB.

The original exemption was: **2020-NOVEMBER-LD-TEST-I-13811** issued on 11/18/2020 which was recently extended on 10/28/2021 through November 18, 2022

While conducting testing and vehicle evaluation of the two previously imported vehicles following items were discovered which resulted in need of two more vehicles.

- 1.) It was discovered in shed testing for evaporative emissions that compound used for rust protection which is injected into the vehicle body after paint process is completed, is too volatile and even when the vehicle is never filled with any gasoline, the emissions from this hydrocarbon compound are so high as to fail the test. This test similar to US required shed test was conducted in Europe.

Based on above UAZ LLC has produced for BREMACH two vehicles, that we now wish to import without this rust protection compound, so that a proper evaporative shed test can be conducted in Emission Laboratory located in USA.

- 2.) UAZ LLC has also started production of the MPV with open cargo bed, which otherwise is mechanically identical to the SUV (Engine, Automatic Transmission, 4x4 system, etc.) It is our belief that this vehicle which is slightly heavier is the "worst case" vehicle and therefore we plan to conduct the certification testing on this "PICKUP" version of the MPV. So that is the purpose for import of that vehicle. We expect that both the SUV and PICKUP version can be on the same EPA CoC and/or CARB EO.

- 3.) As a market research BREMACH, Inc. had created a test website (www.bremach.us) to gauge potential customer interest in the BREMACH Branded vehicles in USA, and while the initial intent was to only market vehicles in USA with Automatic Transmission, to our big surprise we have received very large number of requests for the 4x4 SUV with Manual 5 Speed Transmission.

This is the reason for the import of this second vehicle (also produced without the rust protection compound) so that we have a second vehicle available for the evaporative shed testing and also evaluate this version with the Manual Transmission for feasibility of marketing it in USA.

Test Purpose:

- 1.) Initial engineering evaluation of the two vehicles to determine if they are capable to meet both EPA and CARB exhaust and evaporative emission standards for 2023 Model Year vehicles after performing ECU recalibration for minimum exhaust emissions.
- 2.) Mileage accumulation on California Reformulated gasoline with 10% Ethanol content and octane rating of 87. Mileage accumulation will be done over 3.7 mile (6 km) track located in Clark County, Nevada and transiting into San Bernardino County California. (Image attached).
- 3.) After accumulation of prescribed 4,000 miles the vehicles will be tested for evaporative emissions in ATDS laboratory in Ontario, California
- 4.) After the mileage accumulation of prescribed 4,000 miles the vehicle will be tested for Exhaust emissions at SEMA laboratory in Diamond Bar, California
- 5.) When above laboratory tests are concluded, based on result the data will be provided to EPA and CARB as part of vehicle certification for 2023 Model Year.

The testing needs to be done in USA as in the country of origin the required gasoline Blend is not available and there are no EPA or CARB certified laboratories (Russian Federation).

Vehicle Identification:

Vehicle #1

Make: UAZ Brand: UAZ Manufacturer: UAZ LLC Model: Patriot
Vehicle Class: MPV (SUV) Fuel: Gasoline
Engine Type: Four Cylinder Displacement: 2.7L
Transmission: 5 Speed Manual Shift

UAZ 3163-285-24 (model)
XTT316300N1010224 (VIN)
2022 (model Year) Manufactured in October 2021
\$16 384 (vehicle value)

Vehicle #2

Make: UAZ Brand: UAZ Manufacturer: UAZ LLC Model: Patriot
Vehicle Class: MPV (PICKUP) Fuel: Gasoline
Engine Type: Four Cylinder Displacement: 2.7L
Transmission: 6 Speed Automatic Shift

UAZ 23632-470-01 (model)
XTT236320N1010029 (VIN)
2022 (model Year) Manufactured in October 2021
\$16 384 (vehicle value)

Vehicle ownership (and to whom vehicles will be released and shipped from USA)
(see attached)

LLC ULYANOVSKY AVTOMOBILNY ZAVOD
92, MOSKOVSKOYE SHOSSE, 432034
ULYANOVSK - RUSSIA

Reason Exemption is sought:

It is unknown if the vehicles as manufactured are capable of meeting the EPA and CARB requirements for 2023 MY vehicles, until above mileage accumulation and evaporative and Exhaust tests are performed. The vehicle as manufactured currently meet the **EURO 5** environmental standards as per European Union regulations.

(a) estimated of the program duration;

- 1.) Initial engineering evaluation – 3 to 6 weeks
- 2.) Mileage accumulation – less than 3 months
- 3.) Evaporative Emission Testing – about 2 weeks*
- 4.) Exhaust Emission Testing – about 3 weeks*

Items marked with (*) depend on Test laboratory availability and scheduling.
It is expected that all required tests will be concluded not later than October 31, 2022.

(b) the number of vehicles or engines involved; Two Complete Vehicles

- (c) year and gross vehicle weight rating of each vehicle or engine.
Model Year 2022 – representative configuration of intended 2023 Model Year

(ci)

- Weight
(standard car without options) 2125 kg 4684 lb.
- GVWR
(standard car without options) 2650 kg 5842 lb.
- Maximum Load Capacity
(Passengers and cargo) 525 kg 1157 lb.
(cii)

4(a) the technical nature of the test; To determine if vehicles satisfy EPA and CARB requirements for 2023 Model Year gasoline engine vehicles (MPV)

4(b) the site of the test;

Engineering Evaluation: MIROX Corporation, 95 N Cree St, Sandy Valley, Nevada, 89019

Evaporative Test: ATDS 400 S Etiwanda Ave, Ontario, CA 91761

Exhaust Dynamometer Test: SEMA 1575 Valley Vista Drive, Diamond Bar, CA 91765

Mileage accumulation: Sandy Valley Nevada and California (see attached map)

(c) the time or mileage duration of the test;

Mileage accumulation: 4,000 miles on each vehicle

(ci) estimated of the program duration;

1. Initial engineering evaluation – 3 to 6 weeks
2. Mileage accumulation – less than 3 months
3. Evaporative Emission Testing – about 2 weeks*
4. Exhaust Emission Testing – about 3 weeks*

(cii) Items marked with (*) depend on Test laboratory availability and scheduling.

It is expected that all required tests will be concluded not later than December 31, 2021.

(d) the ownership arrangement with regard to the vehicles or engines involved in the test;

Vehicle ownership (and to whom vehicles will be released and shipped from USA)

(see attached certificate of origin)

LLC ULYANOVSKY AVTOMOBILNY ZAVOD

92, MOSKOVSKOYE SHOSSE, 432034

ULYANOVSK - RUSSIA

(e) the intended final disposition of the vehicles or engines;

Vehicles will be shipped to:

LLC ULYANOVSKY AVTOMOBILNY ZAVOD

92, MOSKOVSKOYE SHOSSE, 432034

ULYANOVSK - RUSSIA

(f) the manner in which vehicle identification numbers or the engine serial numbers will be identified, recorded, and made available;

Photographic Images of the VIN will be made when vehicles arrive to USA (Jacksonville, Florida)

After arrival to Jacksonville, FL vehicles will be transported in Bremach, Inc. owned trailer to Sandy Valley, NV.

(g) the means or procedure whereby test results will be recorded.

Mileage accumulation: By Daily Log and also Data Acquisition from OBD II port and additional on board test equipment.

Evaporative Test: From Test results provided by ATDS

Exhaust Test: From Test results provided by SEMA

I hope that above provided information is adequate for EPA to grant the Testing Exemption.

Thank you.

Sincerely



Miro Kefurt - CEO

BREMACH, Inc.

PS: BREMACH, Inc. has manufacturer account with EPA, the identification is **BRH**

Mileage Accumulation Test Track Route:

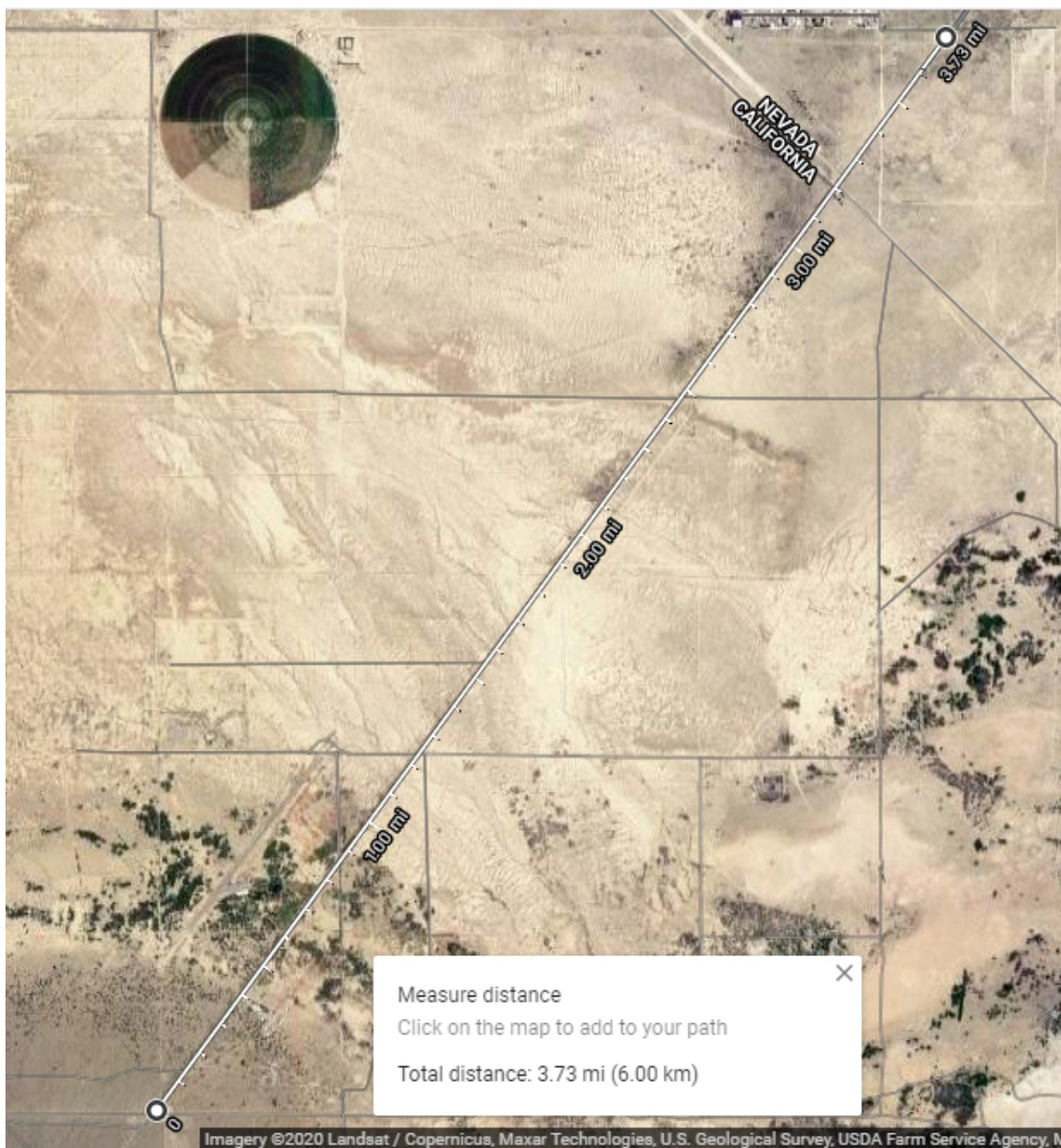
Map:



Mileage Accumulation as per
Appendix IV to Part 86—Durability Driving Schedules

Mileage Accumulation Test Track Route:

Satellite (Google Maps):



Appendix IV to Part 86—Durability Driving Schedules

(a) Durability Driving Schedule for Light-Duty Vehicles and Light-Duty Trucks.

The schedule consists basically of 11 laps of a 3.7 mile course. The basic vehicle speed for each lap is listed below:

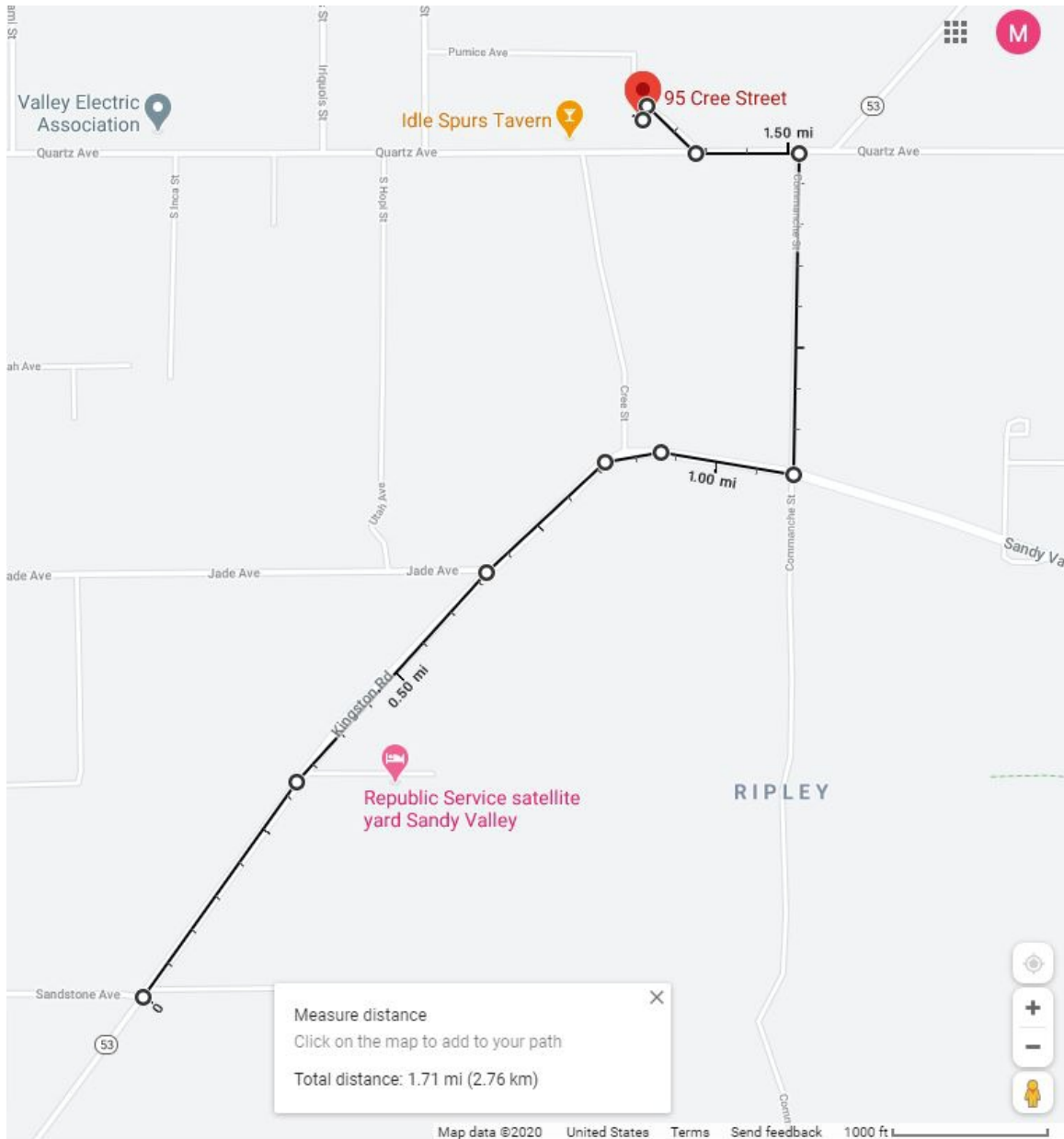
Lap	Speed miles per hour
1	40
2	30
3	40
4	40
5	35
6	30
7	35
8	45
9	35
10	55
11	70

During each of the first nine laps there are 4 stops with 15 second idle. Normal accelerations and decelerations are used. In addition, there are 5 light decelerations each lap from the base speed to 20 m.p.h. followed by light accelerations to the base speed.

The 10th lap is run at a constant speed of 55 m.p.h.

The 11th lap is begun with a wide open throttle acceleration from stop to 70 m.p.h. A normal deceleration to idle followed by a second wide open throttle acceleration occurs at the midpoint of the lap.

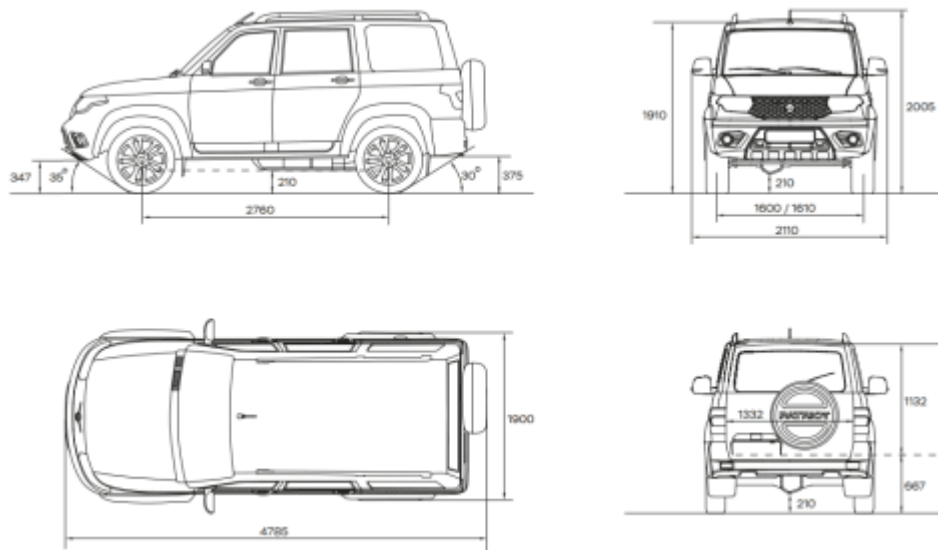
Transit Section from Mileage Accumulation Track
To vehicle service, refueling and overnight storage
Located at 95 N Cree St, Sandy Valley, NV 89019
MIROX Corporation



Vehicle Specifications:

Description		
•Overall Length	4785 mm	188 Inches
•Overall Width	2110 mm	83 Inches
•Overall Height	2005 mm	79 Inches
•Wheelbase	2760 mm	108.7 Inches
•Ground Clearance	210 mm	8.26 Inches
•Entry/Exit Angle	35°	30°
•Ground Clearance	210 mm	8.26 Inches
•Ford Depth	500 mm	19.6 Inches
•Weight (standard car without options)	2125 kg	4684 lb.
•GVWR (standard car without options)	2650 kg	5842 lb.
•Maximum Load Capacity (Passengers and cargo)	525 kg	1157 lb.
•Wheels	18"x6"	Aluminum
•Tire Size	245/60R18	Radial Type
•Front Brakes	Self Adjusting	Hydraulic Disk
•Rear Brakes	Self Adjusting	Hydraulic Drum
• Engine	2.7L 16V In-line 4 cylinder	150hp
• Transmission	6 Speed	Automatic
•Electrical System	12 Volt DC	
•Steering	Rack and Pinion	
•Body	High strength steel	
•Seating Capacity	5	
•Fuel Economy	24.0 MPG	Highway
•Fuel Economy	13.0 MPG	City
•Fuel Economy	18.3 MPG	Combined
•Fuel Tank Capacity	68 Liter	18 US Gallons

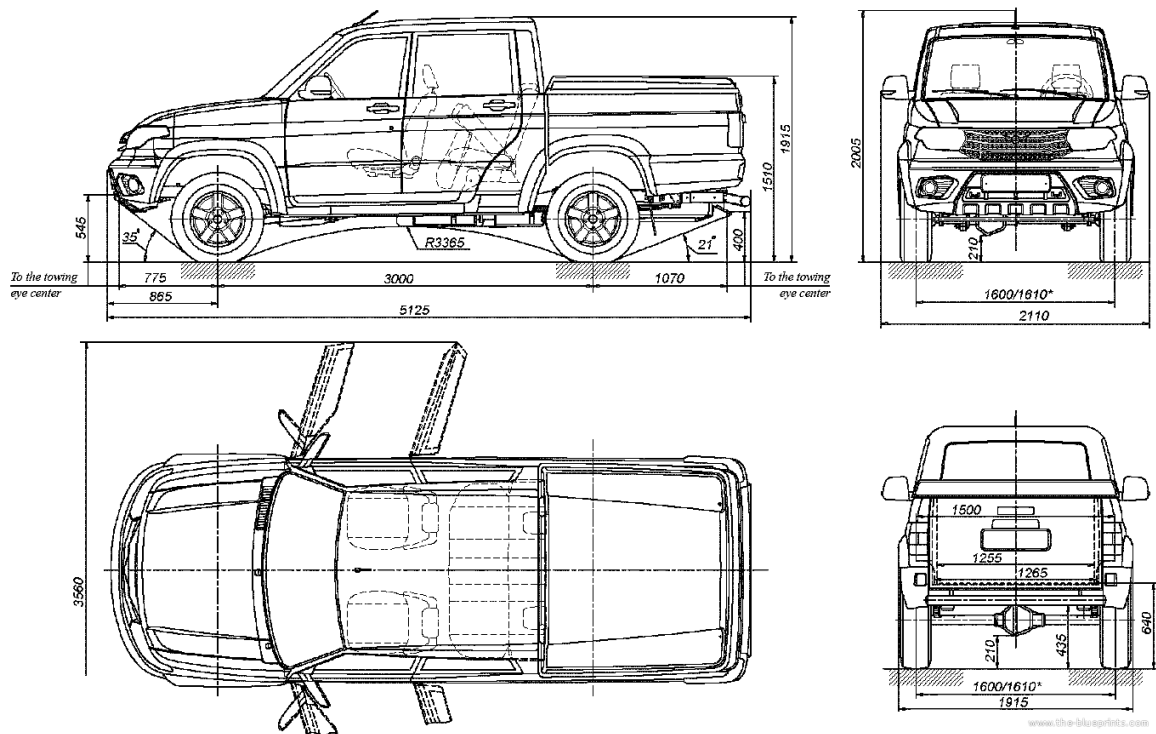
Vehicle #1 Details:



Additional vehicle information can be obtained on

<https://uaz.global/cars/suv/upgraded-patriot>

Vehicle #2 Details:



Hurlin, David

From: mirox@aol.com
Sent: Friday, November 19, 2021 1:46 AM
To: Hurlin, David
Subject: Re: Request for EPA Exemption
Attachments: BREMACH-UAZ-EPA-Test2021.pdf; USA. Origin. A3. 2 veh.pdf

Hello Mr. Hurlin:

Attached is the Request for Temporary Importation - TESTING - in PDF and Certificate of Origin for the vehicles from the Manufacturer UAZ LLC.

Sincerely

**Miro Kefurt
CEO
BREMACH, Inc.**

-----Original Message-----

From: Hurlin, David <hurlin.david@epa.gov>
To: mirox@aol.com <mirox@aol.com>
Sent: Fri, Oct 29, 2021 11:11 am
Subject: RE: EPA Exemption EXT 2020-NOVEMBER-LD-TEST-I-13811

Miro Kefurt,
You should apply for a testing exemption for those vehicle prior to them being shipped.

David C. Hurlin
EPA Imports Line, Exemptions
Managed by Jacobs, Contractor to the U.S. EPA
Phone: (734) 214-4098 or 4100
Fax: (734) 214-4676
